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Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;  
OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE  
CORREDOR IN SUPPORT OF  
PLAINTIFF WAYMO LLC'S MOTION  
FOR RECONSIDERATION OF ORDER  
GRANTING IN PART AND DENYING IN  
PART ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL (DKT. 2326)**

the

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set  
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Plaintiff Waymo LLC’s Motion for  
7 Reconsideration of Order Granting in Part and Denying in Part Administrative Motion to File Under  
8 Seal (Dkt. 2326) (“Motion for Reconsideration”). The Motion for Reconsideration seeks an order  
9 sealing limited portions of exhibits for which the Court denied sealing.

10 3. The portions of Plaintiff’s Responses and Objections to Uber’s Fifth Set of Interrogatories  
11 (Nos. 18-24) (previously filed as Exhibit 1 at Dkt. 1214-6/1294-4) marked in red boxes on page 12, lines  
12 20-24 of the sealed version filed concurrently herewith as Exhibit A (in addition to passages previously  
13 granted sealing) disclose confidential information regarding actual and contemplated Waymo  
14 acquisitions.

15 4. The portions of the July 30, 2017 email from Andrea P. Roberts to counsel for Defendants  
16 (previously filed as Exhibit 6 at Dkt. 1214-16/1294-14) marked in red boxes on pages 20-21 and 24-28 of  
17 the sealed version filed concurrently herewith as Exhibit B consist of proposed search terms that would  
18 disclose Waymo’s trade secrets or detailed technical information from which key aspects of those  
19 trade secrets could be inferred. I understand that public disclosure of these portions could destroy  
20 Waymo’s asserted trade secrets, which would cause Waymo significant competitive harm.

21 5. Waymo’s current request to seal is more narrowly tailored than its prior sealing  
22 requests with respect to Exhibits A-B.

1 I declare under penalty of perjury under the laws of the State of California and the United  
2 States of America that the foregoing is true and correct, and that this declaration was executed in San  
3 Francisco, California, on December 11, 2017.

4 By /s/ Felipe Corredor

5 Felipe Corredor

6 Attorneys for WAYMO LLC

7  
8 **ATTESTATION**

9 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this  
10 document has been obtained from Felipe Corredor.

11  
12 By: /s/ Charles K. Verhoeven

13 Charles K. Verhoeven